



Wiley Rein & Fielding LLP

ORIGINAL

1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

Virginia Office
7925 JONES BRANCH DRIVE
SUITE 6200
MCLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wrf.com

November 29, 2004

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Krista Witanowski
202.719.4626
kwitanow@wrf.com

Marlene Dortch, Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE
Suite 110
Washington, DC 20002

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Federal Communications Commission
Office of Secretary

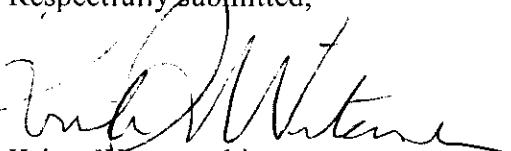
**Re: Response to Notice of Counterproposal, MB Docket #04-161,
Southeastern Ohio Broadcasting System, Inc.,
Re-Allot Channel 273B1, Baltimore, Ohio**

Dear Ms. Dortch:

On behalf of Southeastern Ohio Broadcasting System, Inc., the licensee of WHIZ-FM, Zanesville, Ohio (Facility Id. No. 61230), we here by submit an original and four copies of a Response to FCC's Public Notice of Counterproposal in MB Docket No. 04-161, Report No. 2681, dated November 12, 2004.

Please stamp and return the enclosed extra copy of this filing that is designated for this purpose. If there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,


Krista Witanowski

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of

Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations.
(Wilmington and Mount Sterling, Ohio;
Zanesville and Baltimore, Ohio)

MM Docket No. 04-161
RM-10961
RM-11111

Federal Communications Commission
Office of Secretary

To: The Assistant Chief, Audio Division, Media Bureau

RESPONSE TO NOTICE OF COUNTERPROPOSAL

Southeastern Ohio Broadcasting System, Inc. ("Southeastern"), the licensee of WHIZ-FM, Channel 273B, Zanesville, Ohio, by its attorneys, hereby submits its response to the FCC's Public Notice of Counterproposal in MB Docket No. 04-161, Report No. 2681, dated November 12, 2004.

Southeastern reaffirms its continued interest in amending the FM Table of Allotments by (a) downgrading Channel 273B to Channel 273B1 and realloting Channel 273B1 from Zanesville to Baltimore, Ohio, as the community's first local service, and (b) modifying the WHIZ-FM license to specify operation on Channel 273B1 at Baltimore, Ohio. Southeastern confirms that it will file an application for a construction permit to operate WHIZ-FM on Channel 273B1 at Baltimore and build the facility as authorized if its Counterproposal is granted.

Southeastern's counterproposal is in conflict with the petition filed by Vernon R. Baldwin, Inc. ("Baldwin") to reallocate Channel 272A from Wilmington, Ohio to Mount Sterling,

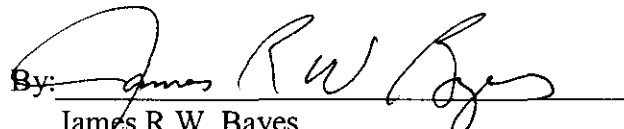
Ohio. Thus, Channel 273B1 can be allotted to Baltimore in accordance with the Commission's spacing rules, except for the proposed allotment of Channel 272A to Mount Sterling.

The Counterproposal clearly should be preferred over Baldwin's proposal for the following reasons: (1) Baltimore has a significantly larger 2000 Census population of 2,881, whereas Mount Sterling is listed in the 2000 Census with a population of only 1,865; (2) WHIZ-FM, operating on Channel 273B1 at Baltimore, Ohio, will provide 60 dBu service to 698,351 persons, representing a net gain of 383,476 persons, or 122 percent, while the Mount Sterling proposal would provide 60 dBu service to only 85,266 persons; and (3) grant of the Counterproposal will eliminate a grandfathered short spacing between WHIZ-FM and WDVE(FM), Channel 273B, Pittsburgh, Pennsylvania.

For the foregoing reasons, Southeastern respectfully submits that the Commission should grant its Counterproposal and deny the conflicting Baldwin proposal.

Respectfully submitted,

SOUTHEASTERN OHIO
BROADCASTING SYSTEM, INC.

By: 
James R.W. Bayes
Krista L. Witanowski

Of

Wiley Rein & Fielding LLP
1776 K Street NW
Washington, DC 20006
TEL: 202.719.7000
FAX: 202.719.7049


Its Attorneys

Dated: November 29, 2004

CERTIFICATE OF SERVICE

I, Kimberly Booth, a secretary in the law firm of Wiley Rein & Fielding LLP do hereby certify that I have on this 29th day of November, 2004 caused a copy of the foregoing "Response to Notice of Counterproposal" to be served by hand delivery, upon the following:

Dennis F. Begley, Esq.
Reddy, Begley & McCormick, LLP
1156 15th Street, N.W.
Suite 610
Washington, DC 20005-1770



Kimberly Booth